

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
FIRST GUARANTY MORTGAGE	)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
	)	
Debtors.	)	<b>Objection Deadline: July 21, 2022 at 4:00 p.m. ET</b>
	)	<b>Hearing Date: July 28, 2022 at 10:00 a.m. ET</b>

**NOTICE OF DEBTORS' APPLICATION FOR AUTHORIZATION TO EMPLOY AND  
RETAIN PACHULSKI STANG ZIEHL & JONES LLP AS CO-COUNSEL FOR THE  
DEBTORS EFFECTIVE AS OF THE PETITION DATE**

**PLEASE TAKE NOTICE** that on July 7, 2022, the above-captioned debtors and debtors-in-possession (the “Debtors”), filed the *Debtors’ Application for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel for the Debtors Effective as of the Petition Date* (the “Application”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Application is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of the order with respect to the relief sought in the Application must be filed with the Bankruptcy Court on or before **July 21, 2022 at 4:00 p.m. Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) proposed counsel to the Debtors, Dentons US LLP, 601 S. Figueroa Street, #2500, Los Angeles, CA 90017, Attn: Samuel R. Maizel, Esq. (samuel.maizel@dentons.com) and Tania M. Moyron, Esq. (tania.moyron@dentons.com) and

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

Dentons US LLP, 1900 K Street, NW, Washington, DC 20006, Attn: David F. Cook (david.f.cook@dentons.com); (ii) proposed co-counsel to the Debtors, Pachulski, Stang, Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones, Esq. (ljones@pszjlaw.com), Timothy P. Cairns, Esq. (tcairns@pszjlaw.com), and Mary F. Caloway, Esq. (mcaloway@pszjlaw.com); and (iii) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Benjamin Hackman, Esq. (benjamin.a.hackman@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE APPLICATION WILL BE HELD ON **JULY 28, 2022 AT 10:00 A.M. EASTERN TIME** BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.**

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Dated: July 7, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)  
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-and -

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*Proposed Counsel for Debtors and Debtors in Possession*